

WESTERN ENERGY
ALLIANCE

March 30, 2017

The Honorable Scott Pruitt
Administrator
U.S. Environmental Protection Agency
Office of the Administrator, 1011A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Administrator Pruitt:

Thank you very much for the President's Executive Order on Promoting Energy Independence and Economic Growth. We appreciate that you and President Trump are fulfilling promises to undo the burdensome red tape constraining domestic energy production and killing jobs. We appreciate your leadership on refocusing EPA back to its core mission of working cooperatively with states to protect the environment. We also appreciate the intention to dismantle the Obama Administration's climate change edifice, which was based on incomplete science, bad economics, and meaningless calculations of the Social Cost of Carbon/Methane. Real U.S. leadership on climate change has been delivered by the oil and natural gas industry; by enabling increased natural gas electricity generation, we have delivered more greenhouse gas reductions any than overreaching federal climate change policy, and the United States now leads the world in reducing greenhouse gas emissions.

Western Energy Alliance represents over 300 companies engaged in all aspects of environmentally responsible exploration and production of oil and natural gas in the West. Alliance members are independents, the majority of which are small businesses with an average of fifteen employees.

Of particular importance to our members is the intent to review and rescind the New Source Performance Standards Subpart OOOOa. We wish to call your attention to the fact that, as the rule is currently in effect, our members continue to incur significant costs to implement it. In addition, a critical implementation date, June 3, 2017, for the overly-prescriptive leak detection and repair program is rapidly approaching. We ask that EPA expeditiously publish a notice in the Federal Register to suspend the OOOOa rule in light of the fact that the follow-on rulemaking process to review and rescind it will likely take several months. Since a suspension requires a thirty-day public notice and comment period, it is imperative that the action happens as soon as possible.

In addition, Western Energy Alliance is one of several industry litigants challenging OOOOa. A suspension will help clarify the Administration's position with respect to the litigation, which has been thrown into much uncertainty. Environmental group intervenors

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may attempt to suspend the litigation in light of the Executive Order, knowing full well that they will litigate the ensuing rule rescinding the Obama rule. With a suspension of the litigation without a suspension of the rule, companies must continue to implement a rule without industry and the government being any nearer to getting clarity from the courts.

Thank you again for your leadership on protecting the environment without needlessly stifling job and economic growth. We look forward to working with you as your agency implements the Executive Order, and stand ready to assist you in any way we can.

Sincerely,



Kathleen M. Sgamma
President

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